

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: NLG, LLC, Debtor.	Chapter 7 Case No. 21-11269-JKS
ALFRED T. GIULIANO, the Chapter 7 Trustee for the estate of NLG, LLC, Plaintiff, v. SELECTIVE ADVISORS GROUP, LLC, Defendant.	Adv. No. 22-50086 (JKS)
ALFRED T. GIULIANO, the Chapter 7 Trustee for the estate of NLG, LLC, Plaintiff, v. SELECTIVE ADVISORS GROUP, LLC, and 9197-5904 QUEBEC, INC., Defendants.	Adv. No. 21-51264 (JKS)
CHRIS KOSACHUK, Plaintiff, v. SELECTIVE ADVISORS GROUP, LLC, Defendant.	Adv. No. 22-50421 (JKS)

**AMENDED NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON JANUARY 31, 2023 AT 1:00 P.M. EST.**

**THE HEARING WILL BE HELD IN PERSON IN JUDGE STICKLE'S COURTROOM.
ALL PARTIES, INCLUDING WITNESSES, WISHING TO PARTICIPATE IN THE
HEARING MUST ATTEND IN PERSON.
COURTCALL WILL NOT BE USED TO DIAL IN.**

Other parties who are not participating in the hearing may observe the hearing remotely by registering at the following Zoom link:

<https://debuscourts.zoomgov.com/meeting/register/vJIsf-yvpzsoGChghV4ooW3o-fwWx5WcGgo>

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

MATTERS GOING FORWARD

1. Order Setting Hearing Date and Deadlines [Docket No. [121](#); Filed December 19, 2022]
 - A. Liza Hazan's Motion to Appear at the Hearing on January 31, 2023 via Zoom [Docket No. [133](#); Filed January 24, 2023]
 - B. Trustee's Notice to Change Case from Asset to No Asset [Docket No. [120](#); Filed December 19, 2022]
 - C. Notice of Filing and Request for Judicial Notice of Supreme Court of the State of New York Appellate Division Dismissing Ramirez's Appeal of Supreme Court of the State of New York Decision [Docket No. [127](#); Filed January 3, 2023]
2. Motion of Chris Kosachuk to Convert Chapter 7 Case to a Case Under Chapter 11 [Docket No. [71](#); Filed August 16, 2022]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received:

- A. Liza Hazan's Response to Motion to Convert [Docket No. [134](#); Filed January 24, 2023]
- B. Objection of America Asset Management, LLC, Selective Advisors Group LLC and 9197-5905 Quebec, Inc. to

Motion to Convert Chapter 7 Case to a Case Under Chapter 11 [Docket No. [135](#); Filed January 24, 2023]

- C. Response of Fox Rothschild LLP to Motion to Convert Chapter 7 Case to a Case Under Chapter 11 [Docket No. [136](#); Filed January 24, 2023]

Related Documents: None

Status: This matter will go forward.

- 3. Expedited Motion of Chris Kosachuk Abandon Pursuant to Section 554(b) [Docket No. [124](#); Filed December 23, 2022]

Response Deadline: January 17, 2023 at 4:00 p.m.

Responses Received:

- A. Liza Hazan's Response to Expedited Motion of Chris Kosachuk Abandon Pursuant to Section 554(b) [Docket No. [132](#); Filed January 20, 2023]

Related Documents:

- A. Motion to Shorten Notice Pursuant to Local Rule 9006-1(e) Regarding Expedited Motion of Chris Kosachuk to Abandon Pursuant to Section 554(b) [Docket No. [125](#); Filed December 23, 2022]
- B. Order Denying Motion to Shorten Notice Pursuant to Local Rule 9006-1(e) Regarding Expedited Motion of Chris Kosachuk to Abandon Pursuant to Section 554(b) [Docket No. [126](#); Filed December 28, 2022]
- C. Notice of Hearing on to Expedited Motion of Chris Kosachuk Abandon Pursuant to Section 554(b) [Docket No. [130](#); Filed January 5, 2023]

Status: This matter will go forward.

- 4. Status Report – Adversary Proceeding 21-51264

- A. Selective Advisors Group, LLC and 9197-5904 Quebec's Motion to Reopen Adversary Proceeding, to Vacate Order Approving Stipulation Dismissing Complaint Without Prejudice, and Decide Adversary Proceeding on the Merits [Docket No. [59](#); Filed May 18, 2022]

- B. Status Report [Docket No. [65](#); Filed January 27, 2023]
- C. Notice of Withdrawal of Docket No. 59 Without Prejudice [Docket [66](#); Filed January 27, 2023]

Status: The Motion to Reopen has been withdrawn. This matter will not go forward.

- 5. Certification of Counsel Regarding Competing Forms of Order Dismissing Adversary Proceeding [Adv. No. 22-50086; Docket No. [60](#); Filed December 30, 2022]

Responses Received:

- A. Objection of Chris Kosachuk to Certification of Counsel and Proposed Orders and Motion for Leave to Intervene and Substitute as Plaintiff for NLG, LLC [Docket No. [61](#); Filed January 12, 2023]
- B. Juan Ramirez's Objection to Certification of Counsel and Proposed Orders of Dismissal [Docket No. [62](#); Filed January 13, 2023]
- C. Response and Reservation of Rights With Respect to Adv. D.I. 61 & 62 filed by Selective Advisors Group, LLC [Docket No. [63](#); Filed January 26, 2023]

Status: This matter will go forward.

MATTERS NOT GOING FORWARD

- 6. Motion to Dismiss Adversary Proceeding [Adv. No. 22-50421; Docket No. [8](#); Filed December 11, 2022]

Responses Received:

- A. Chris Kosachuk's Memorandum of Law in Opposition to Memorandum of Law in Support of Motion to Dismiss Complaint [Docket No. [15](#); Filed January 6, 2023]
- B. Reply in Response to Opposition and in Further Support of Motion to Dismiss filed by 9197-5904 Quebec, Inc. and Selective Advisors Group, LLC [Docket No. [16](#); Filed January 20, 2023]

Related Documents:

- A. Memorandum of Law in Support of Motion to Dismiss filed by 9197-5904 Quebec, Inc. and Selective Advisors Group, LLC [Docket No. [9](#); Filed December 11, 2022]

Status: Notice of Completion of Briefing to be filed. This matter will not go forward.

Respectfully submitted,

FOX ROTHSCHILD LLP

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Attorneys for Alfred T. Giuliano, Chapter 7 Trustee
for the estate of NLG, LLC

Dated: January 27, 2023

CERTIFICATE OF SERVICE

I, Seth A. Niederman, hereby certify that the foregoing Amended Notice of Agenda was served via the Court's CM/ECF electronic filing system on all parties registered and authorized to receive such notice, on January 27, 2023.

I further certify that the foregoing Notice of Agenda was served on the following party via electronic mail, on January 27, 2023:

Chris Kosachuk

chriskosachuk@gmail.com

/s/ Seth A. Niederman

Seth A. Niederman (DE Bar No. 4588)

Dated: January 27, 2023